

January 31, 2025

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**VIA ECF**

The Honorable Natasha C. Merle  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East, Courtroom 2F North  
New York, NY 11201

Re: *Flexer v. Kraft Heinz Food Co.*, Case No. 1:25-cv-414-NCM-TAM  
Request for Extension of Deadline to Respond to Complaint

Dear Judge Merle:

I write on behalf of Defendant Kraft Heinz Foods Company to request a 28-day extension of time of Kraft Heinz's deadline to respond to Plaintiff's complaint from February 14, 2025 until March 14, 2025. Kraft Heinz recently retained our firm as counsel in this matter, and it seeks an extension so it can more fully analyze and investigate Plaintiff's allegations and determine how to respond appropriately.

This is Kraft Heinz's first request for an extension of time, and this extension will affect no other dates set by court order. My partner Dean Panos (who intends to apply *pro hac vice*) has conferred with Plaintiff's counsel, Josh Arisohn, and Mr. Arisohn has confirmed that Plaintiff consents to the requested extension.

Respectfully submitted,

/s/ Elizabeth A. Edmondson  
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